

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

FOX ROTHSCHILD LLP
49 Market Street
Morristown, New Jersey 07690
Telephone: (973) 992-4800
Fax: (973) 992-9125
mherz@foxrothschild.com
Michael R. Herz, Esq.
Attorneys for Catherine E. Youngman
Chapter 7 Trustee

In Re:

AMERICAN PRECISION SHEET METAL CORP.,

Debtor.

Chapter 7

Case No. 16-12813-KCF

Judge: Hon. Kathryn C. Ferguson

Hearing Date: December 19, 2017

Hearing Time: 11:00 a.m.

**NOTICE OF MOTION FOR ENTRY OF AN
ORDER AUTHORIZING SALE OF HYDRAULIC PRESS**

PLEASE TAKE NOTICE that on December 19, 2017 at 11:00 a.m., or as soon thereafter as counsel may be heard, Catherine E. Youngman, Chapter 7 trustee (the “Trustee”) for American Precision Sheet Metal Corp., by and through her counsel, Fox Rothschild LLP, will move before the Honorable Kathryn C. Ferguson, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order authorizing the sale of a Accurpress Model 717512 Hydraulic Press Brake (the “Hydraulic Press”) pursuant to 11 U.S.C. § 363(b) and (f), granting such other and further relief that the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Trustee’s Motion, the

undersigned shall rely upon the certification and memorandum of law submitted herewith pursuant to D.N.J. LBR 9013-1(a).

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon the Trustee's and undersigned counsel at 49 Market Street, Morristown, New Jersey 07960, no later than seven (7) days prior to the return date.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, this motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-3 and the relief sought herein may be granted without a hearing.

FOX ROTHSCHILD LLP
Attorneys for Chapter 7 Trustee

By: /s/Michael R. Herz
Michael R. Herz, Esq.

Dated: November 21, 2017